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June 27, 2003

Jeffrey N. Pritzker, Esquire
Margolis, Pritzker & Epstein, P.A.
405 Joppa Road, Suite 100
Towson, Maryland 21286

Re: United States v. One 1997 Mercedes Benz, et al.
Civil No. JFM-02-2981

Dear Mr. Pritzker:

The following agreement is proposed. Once the agreement is fully executed and returned to me, I will forward it to the Court with a motion for an order of forfeiture. Once the order is entered, I will forward it to the appropriate agency for disposition.

SETTLEMENT AGREEMENT

This Settlement Agreement is made between Tonyetta Newman ("the claimant") and the United States of America ("the government"):

WHEREAS, the claimant filed a claim to the defendant One 1997 Mercedes Benz and \$10,219.00 U.S. Currency; and

WHEREAS, the claimant neither admits nor disputes the government's assertion that reasonable cause existed for the seizure of the defendant property; and

WHEREAS, the parties wish to reach a fair and expedited resolution to this matter;

NOW, THEREFORE, for the foregoing reasons and for good and substantial consideration, the adequacy and receipt of which is hereby acknowledged, the claimant and the government agree as follows:

EXHIBIT A

1. The government agrees to release the defendant \$10,219.00 of the defendant U.S. Currency to the claimant, by check made payable to Jeffrey N. Pritzker, Esquire.

2. The claimant agrees not to contest the forfeiture of the defendant 1997 Mercedes Benz to the government and hereby relinquishes all right, title and interest therein.

3. The claimant agrees to indemnify and hold the government harmless from and against all claims, damages, losses, and action resulting from or arising out of the seizure and release of property described in paragraph 1 ~~and 2 above~~. 4

4. The claimant agrees that the government may submit a copy of this agreement in connection with a request for an Order of Forfeiture.

5. This agreement states the entire agreement reached between the parties hereto.

Thomas M. DiBiagio
United States Attorney

7/11/03
Date

Jacabed Rodriguez-Coss
Jacabed Rodriguez-Coss
Assistant United States Attorney by TB

7/10/03
Date

Tonyetta Newman
Tonyetta Newman

7/10/03
Date

Jeffrey N. Pritzker
Jeffrey N. Pritzker, Esquire